

Paul J. Byrne (SBN 190860)  
Brian S. Healy (SBN 112371)  
**CORNERSTONE LAW GROUP**  
575 Market Street, Suite 3050  
San Francisco, California 94105  
(415) 357-2094 tel  
(415) 974-6433 fax  
pbyrne@cornerlaw.com  
byhealy@cornerlaw.com

Attorneys for Defendant  
MODIS, INC.

HARMEET K. DHILLON (SBN: 207872)  
Harmeet@dhillonlaw.com  
KRISTA L. BAUGHMAN, ESQ. (SBN: 264600)  
kbaughman@dhillonlaw.com  
DHILLON LAW GROUP INC.  
177 Post Street, Suite 700  
San Francisco, California 94108  
Telephone: (415) 433-1700  
Facsimile: (415) 520-6593

Attorneys for Plaintiff  
Beta Soft Systems, Inc.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

BETA SOFT SYSTEMS, INC., a California  
corporation

Plaintiff,

vs.

MODIS, INC., d/b/a MODIS IT, INC., a Florida  
corporation;

Defendants.

No. 3:14-cv-5169-RS

**STIPULATION AND ~~PROPOSED~~ ORDER  
EXTENDING PRE-TRIAL DEADLINES**

Complaint Filed: November 21, 2014  
Trial Date: February 22, 2016

1 The Parties previously stipulated to, and obtained from the Court, a first extension of the  
2 deadline to designate experts, until August 20, 2015 (Docket 27). In light of the anticipated second  
3 mediation, which is expected to take place within the next few weeks, the Parties stipulate to and  
4 request extensions of the following pre-trial deadlines originally scheduled by the Court (Docket 21;  
5 Docket 27):

- 6 • An extension of the deadline to designate experts, currently set for August 20, 2015, until  
7 September 11, 2015;
- 8 • An extension of the deadline to designate supplemental and rebuttal experts, currently set for  
9 August 27, 2015, until October 1, 2015;
- 10 • An extension of the deadline to complete all discovery of expert witnesses pursuant to FRCP  
11 26(b)(4), and to complete all non-expert discovery, currently set for September 14, 2015,  
12 until October 23, 2015;
- 13 • An extension of the deadline to hear all pretrial motions, currently set for October 15, 2015,  
14 until November 19, 2015.

15 The Parties request that the pre-trial conference and trial dates originally scheduled for  
16 January 28, 2016, and February 22, 2016, respectively, remain unchanged.

17 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

18  
19 Date: August 13, 2015

DHILLON LAW GROUP INC.

20  
21  
22 By: /s/ Krista L. Baughman  
23 Harmeet K. Dhillon  
24 Krista L. Baughman  
25 Attorneys for Plaintiff Beta Soft Systems, Inc.  
26  
27  
28

1 Date: August 13, 2015

CORNERSTONE LAW GROUP

2  
3 By: /s/ Paul J Byrne

4 Paul J. Byrne  
5 Brian S. Healy  
6 Attorneys for Defendant  
7 MODIS, INC.

8 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

9  
10 DATED: 8/13/15

  
United States District Judge